

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON/GREENWOOD DIVISION**

**Jack Brooks, Ellen Brooks,
Angela Posey, James Morocco,
Sybil McDaniel, Diane Haner,
and Kathleen Erickson,**

Plaintiffs,

vs.

**GAF Materials Corporation and
Building Materials Corporation of
America dba GAF Materials
Corporation,**

Defendants.

Management Case No. 8:11MN2000-JMC

**IN RE: BUILDING MATERIALS
CORPORATION OF AMERICA ASPHALT
ROOFING SHINGLE PRODUCTS
LIABILITY LITIGATION MDL 2283**

**This filing relates to the Management File
here captioned and the following related
civil actions.**

C/A No. 3:11-cv-02784-JMC

C/A No. 8:11-cv-02785-JMC

C/A No. 8:11-cv-02879-JMC

C/A No. 8:11-cv-02926-JMC

C/A No. 8:11-cv-03085-JMC

**DEFENDANT GAF'S CONSENT MOTION FOR AN EXTENSION OF TIME TO
ANSWER, MOVE TO DISMISS OR OTHERWISE RESPOND TO COMPLAINTS**

Defendant GAF Materials Corporation (hereinafter "GAF") moves, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, as well as Local Civil Rule 6.01, D.S.C. and Local Civil Rule 12.01, D.S.C., for an extension of time in which to answer, move to dismiss or otherwise respond to (i) the complaints filed in the five related civil actions listed above, which have been transferred to this Court pursuant to the Transfer Order issued by the Judicial Panel on Multidistrict Litigation (the "Panel") on October 11, 2011 and Conditional Transfer Order of the Panel effective November 10, 2011, and (ii) any complaints filed in any actions that may be transferred to this Court as "tag-along" actions by order of the Panel for coordinated or

consolidated pretrial proceedings with the above-captioned actions, including but not limited to *Ragan v. Building Materials Corp. of America d/b/a GAF Materials Corp.*, Civil Action No. 2:11-cv-01478-JFC, which was filed on November 18, 2011 in the United States District Court for the Western District of Pennsylvania, Pittsburgh Division, and for which a Notice of Potential Tag-Along Action was filed by GAF on December 8, 2011.

In light of the expectation that future proceedings in these actions and potential tag-along actions will be coordinated or consolidated, GAF requests an extension of time to answer, move to dismiss or otherwise respond to the current operative complaints in the related actions listed above and the complaints filed in any future tag-along actions until 15 days after the later to occur of (i) the first status conference in the above-captioned Management Case or (ii) the filing by plaintiffs of a Consolidated Amended Complaint (or such any other date as the Court may direct). The requested extension will not affect any other deadlines currently in place because the Court has not yet entered a scheduling order in any of these five actions.

Counsel for GAF, prior to filing this motion, has consulted with Plaintiffs' counsel in the five actions, who consent to these extensions of time.

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December 12, 2011
Columbia, South Carolina